

Cunningham, Deborah L@DOT

From: Jesse Lattig <jlattig@pasadenaheritage.org>
Sent: Friday, August 14, 2015 6:10 PM
To: Affordable Sales Program@DOT
Subject: Comments / Revised Regulations on Affordable Sales SR-710 Properties
Attachments: PH_710_Revised Affordable Sales_082015.pdf

Please find attached hereto comments regarding the revised Regulations on Affordable Sales of SR-710 Properties owned by Caltrans.

Jesse Lattig
Preservation Director



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August 14, 2015

Kimberly Erickson
ATTN: Affordable Sales Program
California Department of Transportation
1120 N Street, MS 37
Sacramento, CA 95814

Comments on Proposed Regulations for Affordable Sales Program

Dear Ms. Erickson,

Pasadena Heritage appreciates this opportunity to provide feedback on the revised Regulations for the Affordable Sales Program. As a non-profit organization dedicated to the preservation of historic and cultural resources in Pasadena, we have been closely involved with this project for almost 40 years. We now welcome the release of these properties and the community benefits their return to private ownership will bring.

Echoing the comments of our colleagues at the National Trust for Historic Preservation, the Los Angeles Conservancy, and the City of South Pasadena, we are also very concerned that the regulations fail to address the role of historic preservation covenants. As stated in our letter dated August 28, 2014, local municipalities may or may not have historic preservation ordinances in place that protect historic resources, and those that do may vary greatly from community to community and are subject to change. Because of this, Pasadena Heritage believes a combination of historic overlay designation and preservation covenants are necessary to achieve adequate and long-term protection required under CEQA and California Civil Code Section 815-816. We appreciate and support further work of Caltrans with qualified easement-holding preservation organizations to explore this process, to develop clear and appropriate language, and address the compensation necessary to adequately enforce the covenants in perpetuity. It is of great importance that this issue be resolved prior to the offering and sale of any historic resources, either individually or those located within identified historic districts.

Additionally, Caltrans should re-instate the individual parcel boundaries of all properties it holds in the SR-710 corridor; a legal description is required in order to convey covenants or ownership.

We also note the need for greater clarification by Caltrans on determining a reasonable price that reflects the existing conditions for properties that are to be repurposed and are not to be redeveloped for profit, for example by the cities and/or non-profit organizations to provide public, free or low-cost services.

Thank you for the opportunity to comment and provide feedback on the Affordable Sales Program. We gladly offer our further assistance to ensure adequate long-term protection for historic resources prior to their sale.

Sincerely,

Susan N. Mossman
Executive Director

Jesse Lattig
Preservation Director